

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,)
DEONTAE TATE, JEREMY S. MELTON, ISSACCA) **Case No. 2:16-cv-2907-**
POWELL, KEITH BURGESS, TRAVIS BOYD,) **SHM/tmp**
TERRENCE DRAIN, and KIMBERLY ALLEN on)
behalf of themselves and all similarly situated persons,)
)
PLAINTIFFS,) **CLASS ACTION**
v.) **COMPLAINT FOR**
) **VIOLATIONS OF THE**
) **CIVIL RIGHTS ACT OF**
) **1871, 42 U.S.C. § 1983,**
) **TENNESSEE COMMON**
) **LAW, DECLARATORY,**
) **AND INJUNCTIVE RELIEF**
BILL OLDHAM, in his individual capacity as former)
Sheriff of Shelby County, Tennessee; FLOYD) **JURY TRIAL DEMANDED**
BONNER, JR., in his official capacity as Sheriff of) **PURSUANT TO FED. R.**
Shelby County, Tennessee; ROBERT MOORE, in his) **CIV. PRO. 38(a) & (b)**
individual capacity as former Jail Director of Shelby)
County, Tennessee; KIRK FIELDS, in his official)
capacity as Jail Director of Shelby County, Tennessee;)
CHARLENE McGHEE, in her individual capacity as)
former Assistant Chief of Jail Security of Shelby)
County, Tennessee; REGINALD HUBBARD, in his)
official capacity as Assistant Chief of Jail Security of)
Shelby County, Tennessee; DEBRA HAMMONS, in)
her individual capacity as former Assistant Chief of Jail)
Programs of Shelby County, Tennessee; TIFFANY)
WARD in her official capacity as Assistant Chief of Jail)
Programs of Shelby County, Tennessee; SHELBY)
COUNTY, TENNESSEE, a Tennessee municipality;)
TYLER TECHNOLOGIES, INC., a foreign)
corporation; GLOBAL TEL*LINK CORPORATION, a)
foreign corporation; SOFTWARE AG USA, INC., a)
foreign corporation; and SIERRA-CEDAR, INC., a)
foreign corporation,)
DEFENDANTS.)

NOTICE OF SERVICE

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, on behalf themselves and all similarly situated persons (hereinafter “the Plaintiffs”), by and through their designated attorneys and, pursuant to Local Rule 26.1(a)(2), provide this Notice that on April 15, 2019, Plaintiffs served their First Set of Interrogatories and Requests for Production of Documents Propounded upon Defendant Sierra-Cedar, Inc.

Respectfully submitted,

/s/ William E. Cochran, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2019, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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